

SWIDLER BERLIN SHEREFF FRIEDMAN, LLP

THE WASHINGTON HARBOUR
3000 K STREET, NW, SUITE 300
WASHINGTON, DC 20007-5116
TELEPHONE (202) 424-7500
FACSIMILE (202) 424-7647
WWW.SWIDLAW.COM

Eliot J. Greenwald
Direct Dial: (202) 424-7809
Fax: (202) 424-7643
EJGreenwald@swidlaw.com

NEW YORK OFFICE
THE CHRYSLER BUILDING
405 LEXINGTON AVENUE
NEW YORK, NY 10174
TEL. (212) 973-0111
FAX (212) 891-9598

October 15, 2002

BY ELECTRONIC COMMENT FILING SYSTEM

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Report of Amarillo License, L.P. for Station KNKA574 and
High Plains Wireless, L.P. for Station KNLF919 on
Implementation of TTY Digital Compatibility for 911
Emergency Calling
CC Docket No. 94-102**

Dear Ms. Dortch:

On behalf of Amarillo License, L.P. ("Amarillo") and High Plains Wireless, L.P. ("High Plains"), pursuant to CC Docket No. 94-102, Fourth Report and Order, we hereby submit their report on implementation of TTY digital compatibility for 911 emergency calling for Stations KNKA574 and KNLF919. On June 28, 2002, the Commission extended the final implementation date until December 31, 2003 for Amarillo and High Plains.

Development Activities

(1) Network infrastructure software development

Amarillo and High Plains currently use Lucent Technologies ("Lucent") as the infrastructure provider for their TDMA systems. However, Amarillo and High Plains are currently in the process of considering the replacement of their TDMA equipment with either CDMA or GSM equipment. If such replacement is made, Amarillo and High Plains would look into purchasing equipment that includes TTY digital compatibility.

(2) Handset development and testing plans

As part of the process of exploring whether to replace their TDMA equipment with either CDMA or GSM equipment, Amarillo and High Plains will make inquiries regarding handsets with TTY digital compatibility.

(3) Beta testing and lab testing

The manufacturers are responsible for beta testing and lab testing.

(4) Release and general availability to carriers of network infrastructure software

Amarillo and High Plains understand that most new network equipment with either the CDMA or GSM air interfaces will include TTY digital compatibility.

(5) Availability to carriers of full acceptance test units

Amarillo and High Plains understand that full acceptance test units will be available for either the CDMA or GSM air interfaces.

(6) Efforts toward achieving digital wireless solution compatibility with enhanced TTY devices

Amarillo and High Plains are currently in the process of considering the replacement of their TDMA equipment with either CDMA or GSM equipment. If such replacement is made, Amarillo and High Plains would look into purchasing equipment that includes TTY digital compatibility.

Testing and Deployment Activities

(7) Carrier coordination of testing with PSAP

The PSAP is not yet ready for TTY digital compatibility.

(8) Carrier testing activities, including field testing, consumer end-to-end testing and other necessary tests

Testing cannot take place with the current equipment.

(9) Retail availability of necessary consumer equipment

Amarillo and High Plains will make available handsets with TTY digital compatibility upon request.

(10) Geographic scope of network infrastructure deployment

Once TTY digital compatibility is achieved, it will be deployed throughout all parts of the Amarillo, TX MSA where Amarillo is capable of providing service to customers and all parts of the Amarillo, TX BTA where High Plains is capable of providing service to customers.

Please address any inquiries regarding this matter to the undersigned.

Respectfully submitted,

/s/

Eliot J. Greenwald

Cc: Qualex International (by e-mail)
Pam Gregory (by e-mail)
Mindy Littell (by e-mail)
Barry Ohlson (by e-mail)